

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

MARY B. RUDOLPH, et al.,

Plaintiff,

v.

**BEACON INDEPENDENT LIVING LLC, et
al.,**

Defendant.

Civil Action No. 3:11-CV-00617

**JOSEPH M. MELDRICH SR.
AFFIDAVIT**

Now Comes Joseph M. Meldrich Sr. and swears:

1. I am over the age of 18 years old.
2. I am a citizen of North Carolina.
3. I want correct the record of my deposition taken on June 27, 2012 by Mr. Horner. I have gone to Mr. Bleiman's home on many occasions to discuss business about The Beacon.
4. On June 26, we met to discuss some payroll items and the recent VA funds deposit. We also discussed how I would provide my emails pertaining to The Beacon. There were a lot of emails, and I wasn't sure how to supply them. The subpoena requested that all documents be produced in native/ESI format. Neither of us knew what that meant. We discovered that some of the emails

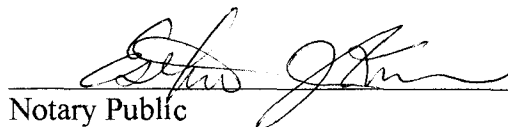
5. After the deposition, I was sequestered in a room with Horner and Snyder. In the room they were making out like there was a serious fraud going on. I told them that my email file is backed up every day and that I could recover those deleted emails. The following day I supplied Mr. Snyder with 100% of all the emails pertaining to The Beacon.
6. There was no willful and wanton spoliation of evidence by Mr. Bleiman. I deleted the emails on my computer. Mr. Bleiman didn't delete anything or spoil any evidence.
7. In the normal course of my business I delete emails all the time.
8. In the 10 months that I've known Mr. Bleiman I believe him to be a good and honest man. He has expended thousands of hours of his time, sweat, and tears into The Beacon. He has never received a dime for his efforts. He and his family have invested tens of thousands of dollars in upgrades and cash loans to keep the facility open. Mary Rudolph and her gang have done nothing but to commit a giant fraud against the Veterans Administration, the Social Security Administration, the DSS and the IRS.

Further the Affiant sayeth not:



Joseph M. Meldrich Sr.

SWORN to before me this 3 day of ^{July}~~May~~, 2012


Notary Public

My Commission Expires: 10-18-2016

